

Fill in this information to identify the case:

Debtor 1 Joseph E Stahurski

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the: Middle District of Pennsylvania
(State)

Case number 5:19-bk-00120-MJC

Official Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: LoanCare, LLC

Court claim no. (if known): 13

Last 4 digits of any number you use to identify the debtor's account: 7397

Property address:

**65 Floral Dr
Gouldsboro, PA 18424**

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with §1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow and costs.

The next postpetition payments from the debtor(s) is due on: 11/01/2022*
MM/DD/YYYY

*Creditor is in the process of obtaining a missing portion of the prior payment history and may need to amend this response at a later date if the missing records alter Creditor's understanding of the current status of the loan.

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with §1322(b)(5) of the Bankruptcy Code, include all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow, and costs outstanding: (b) \$ _____
- c. **Total.** Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payments(s) that first became due on:

_____/_____/_____
MM/DD/YYYY

Part 4: Itemized payment History

If the creditor disagrees in Part 2 that the prepetition arrearage had been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this Notice must sign it. Sign and print your name and your title, if any, and state your address and telephone number.

Check the appropriate box:

- ☐ I am the creditor.
- ☒ I am the creditor's attorney or authorized agent.

I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief:

X /s/ Daniel P. Jones
Signature

Date November 14, 2022

Print: Daniel P. Jones
First Name Middle Name Last Name

Title: Attorney for Creditor

Company Stern & Eisenberg, PC

If different from the notice address listed on the proof of claim to which this response applies:

Address:

1581 Main Street, Suite 200
The Shops at Valley Square
Warrington, PA 18976

Contact phone (215) 572-8111

Email: djones@sterneisenberg.com

Certificate of Service

I hereby certify that a copy of the foregoing Response to Notice of Final Cure Payment was served on the parties listed below by postage prepaid U.S. Mail, First Class or served electronically through the Court's ECF System at the e-mail address registered with the Court on this Date.

Date: November 14, 2022

John Fisher

126 South Main Street
Pittston, PA 18640
johnvfisher@yahoo.com
Counsel for Debtor

Jack N Zaharopoulos
8125 Adams Drive, Suite A
Hummelstown, PA 17036
info@pamd13trustee.com
Chapter13 Trustee

Office of the U.S. Trustee
228 Walnut Street
Suite 1190
Harrisburg, PA 17101
ustpreion03.ha.ecf@usdoj.gov
U.S. Trustee

and by standard first class mail postage prepaid to:

Joseph E Stahurski
95 Country Club Estates
65 Floral Drive 1
Thornhurst, PA 18424
Debtor(s)

By: /s/ Daniel P. Jones
Daniel P. Jones, Bar No: 321876
Stern & Eisenberg, P.C.
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Counsel for Movant